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I. Plaintiff's Trial Exhibits

Plaintiff may offer the following exhibits in its case in chief:

Exhibit No.	Bates Range	Description	Defendant's Objection
1.	LKI0001645; LKI000855; ADB(MOTION TO DISMISS)0063340; KBC-Venue-Discovery002365 [Plaintiff Deposition Exhibit P-63]	(i)KBC-NY Transfer Form, dated 8/20/2007 sent to KBC-NY; (ii) one page from Lazare's KBC-NY Bank Account Statement dated August 2007; (iii) ADB Loan Folios ("blue slips") dated August 21 and 22, 2007; and (iv) one page from ADB Pooling Account Statement, dated August 2007.	
2.	KBC-Venue-Discovery000102-123 [Plaintiff Deposition Exhibit P-7]	Lazare's Bank Statements for KBC-NY Bank Account 24079801 dated May 2, 2007 to May 31, 2007, and November 1, 2007 to November 30, 2007.	
3.	LKI0000854-857	Lazare's Bank Statement for KBC-NY Bank number 24079801 dated August 1, 2007 to August 31, 2007	
4.	ADB(MOTION TO DISMISS)00063340	ADB loan folios ("blue slip") For Lazare Credit Facility, dated August 21, 2007 and August 22, 2007	

Exhibit No.	Bates Range	Description	Defendant's Objection
5.	LKI0001000-1696	Transfer Forms For Lazare's KBC-NY Bank Account between dates November 27, 2001 to February 23, 2009	
6.	ADB(MOTION TO DISMISS)00000813-816	ADB Credit confirmation letter, December 14, 2000	
7.	KBC-Venue-Discovery000422	KBC-NY Telecommunications Instructions, December 20, 2000	
8.	KBC-Venue-Discovery000419	KBC-NY Request For Taxpayer Identification Number and Certification, December 20, 2000	
9.	KBC-Venue-Discovery000318 [Plaintiff Deposition Exhibit P-2]	KBC-NY Call Report, January 23, 2001	
10.	KBC-Venue-Discovery000519-520 [Plaintiff Deposition Exhibit P-3]	KBC-NY Facsimile to William Moryto, March 23, 2001	
11.	KBC-Venue-Discovery000329-338 [Plaintiff Deposition Exhibit P-4]	(i) KBC-NY Letter to William Moryto, March 29, 2001; (ii) amended KBC account agreement	
12.	KBC-Venue-Discovery000408-411	KBC-NY Opening Form and Signature Card, May 31, 2001	
13.	KBC-Venue-Discovery000420-21	Lazare Corporate Resolutions, May 31, 2001	

Exhibit No.	Bates Range	Description	Defendant's Objection
14.	KBC-Venue-Discovery000319 [Plaintiff Deposition Exhibit P-55]	May 31, 2001 Agreement	
15.	KBC-Venue-Discovery000304-307 [Plaintiff Deposition Exhibit P-9]	KBC-NY Facsimile, November 16, 2001 re: Opening of Account at KBC-NY	
16.	ADB(MOTION TO DISMISS)00000851-856 [Plaintiff Deposition Exhibit P-41]	ADB Credit Confirmation Letter, February 20, 2008	
17.	LKI0001862	ADB application form	
18.	ADB(MOTION TO DISMISS)00000039-49 Plaintiff Deposition Exhibit P-49]	(i)E-mail from Champine to Moryto re: General Conditions, March 27, 2008; (ii) General credit granting conditions; (iii) General conditions for banking operations	
19.	LKI0002176-0002178	(i) ADB Demand Letter for Lazare Credit Facility, March 3, 2010; (ii) ADB Termination Letter For Lazare Credit Facility, December 28, 2009	
20.	KBC-Venue-Discovery000002-3 [Plaintiff Deposition Exhibit P-57]	AGREEMENT WITH RESPECT TO THE DELIVERY OF OPERATIONAL BANKING SERVICES, dated October 15, 1999	

Exhibit No.	Bates Range	Description	Defendant's Objection
21.	KBC-Venue-Discovery000408-42 [Plaintiff Deposition Exhibit P-1]	(i) KBC-NY Bank Account Opening Form and Signature Card, dated May 31, 2001 including passport photos and copies of drivers licenses; (ii) Lazare Form W-9, December 20, 2000; (iii) Lazare Corporate Resolutions , May 31, 2001; (iv) Lazare Telecommunications Instructions, December 20, 2000	
22.	KBC-Venue-Discovery000323 [Plaintiff Deposition Exhibit P-5]	Memo dated May 10, 2001 from Maeckelbergh to Driesen re: account opening documents.	
23.	KBC-Venue-Discovery000316 [Plaintiff Deposition Exhibit P-8]	November 13, 2001 Internal note indicating Lazare's KBC-NY Bank Account is operational	
24.	KBC-Venue-Discovery000514 [Plaintiff Deposition Exhibit P-10]	Email dated November 13, 2001 from M. Maeckelbergh to P. Driesen, cc Weks and Boston, re: New Account Lazare Kaplan	
25.	ADB(MOTION TO DISMISS)0006299-6302 [Plaintiff Deposition Exhibit P-11]	(i) Email dated November 26, 2007 from Loral to De Bosscher, cc Weiss & Champine re: LKI Report on Presentation October 2007; (ii) attachment titled "LKI - Report	

Exhibit No.	Bates Range	Description	Defendant's Objection
		on presentation Oct 2007"	
26.	ADB(MOTION TO DISMISS)0001353 [Plaintiff Deposition Exhibit P-12]	November 25, 2008 loan folio ("blue slip")	
27.	ADB(MOTION TO DISMISS)0062293 [Plaintiff Deposition Exhibit P-13]	March 3, 2010 ADB loan folio ("blue slip") For Lazare Credit Facility	
28.	ADB(MOTION TO DISMISS)0008343-44 [Plaintiff Deposition Exhibit P-14]	(i) Email dated December 18, 2008 from Loral to Weiss re: straight loans; (ii) attachment titled "FB_Omloop Straight Loans"	
29.	ADB(MOTION TO DISMISS)00055992 [Plaintiff Deposition Exhibit P-15]	Email dated August 5, 2009 from Champine to Moryto re: confirmation of keeping straight loan at \$43MM for two weeks	
30.	ADB(MOTION TO DISMISS)0003858 [Plaintiff Deposition Exhibit P-16]	Email dated November 25, 2008 Email from Champine to Weiss and Loral re: LKI	
31.	ADB(MOTION TO DISMISS)00005990-5991 [Plaintiff Deposition Exhibit P-18]	Email dated December 17, 2008 from Loral to De Bosscher, Weiss, Champigne and [redacted] re: LKI Open Issues in brief	

Exhibit No.	Bates Range	Description	Defendant's Objection
32.	ADB(MOTION TO DISMISS)00002333-2336 [Plaintiff Deposition Exhibit P-19]	Email dated June 2, 2009 June 2, 2009 from Champine to Loral re: LKI borrowing base	
33.	ADB(MOTION TO DISMISS)00063187 [Plaintiff Deposition Exhibit P-21]	Email dated July 8, 2009 from Loral to Champine re: Lazare Kaplan Internat.	
34.	ADB(MOTION TO DISMISS)00001870-1882 [Plaintiff Deposition Exhibit P-22]	Borrowing base certificate dated October 31, 2008	
35.	ADB(MOTION TO DISMISS)00001536-1575 [Plaintiff Deposition Exhibit P-24]	September 12, 2008 Report on Lazare	
36.	ADB(MOTION TO DISMISS)00063186 [Plaintiff Deposition Exhibit P-25]	Email dated April 14, 2009 from De Bosscher to Loral re: keeping withdrawals with all NY banks at equal levels	
37.	ADB(MOTION TO DISMISS)00063697-98 [Plaintiff Deposition Exhibit P-29]	(i) Email dated July 3, 2009 from Loral to Champine re: LKI letter - draft 2; (ii) attachment titled "LKI Letter - 03.7.09"	
38.	KBC-Venue-Discovery000705-706 [Plaintiff Deposition Exhibit P-34]	Email dated October 28, 2009 from Verellen to Orellana re: adjusting credit limit for account 24079801	
39.	ADB(MOTION TO DISMISS)00002951 [Plaintiff Deposition Exhibit P-36]	Email dated January 20, 2009 from Loral to [redacted], cc Weiss and Champine re: LKB	

Exhibit No.	Bates Range	Description	Defendant's Objection
		debt level with bank to level of actual sales cover. As debt reduces LKI facility with KBC should be increased to last BBC	
40.	ADB(MOTION TO DISMISS)00070303-10 [Plaintiff Deposition Exhibit P-40]	Email dated December 14, 2009 from [redacted] to [redacted], cc Snyers re: tax preparation. Fourth quarter 2009	
41.	ADB(MOTION TO DISMISS)00069894-69895 [Plaintiff Deposition Exhibit P-44 & 44A]	Email dated October 28, 2009 e-mail among redacted ADB personnel re: "KBC-waarborgen" with translation	
42.	ADB(MOTION TO DISMISS)00000074 [Plaintiff Deposition Exhibit P-47]	Email dated January 26, 2004 from Snyers to [redacted] and Champine re: preparation of new credit confirmation letter	
43.	ADB(MOTION TO DISMISS)00001221, 1296 & 1349 [Plaintiff Deposition Exhibit P-51]	ADB Loan Folios ("blue slips), dated January 18, 2008 and July 9, 2008 and November 10, 2008	
44.	ADB(MOTION TO DISMISS)00067144-67146 [Plaintiff Deposition Exhibit P-52]	ADB Termination letter dated December 28, 2009	
45.	ADB(MOTION TO DISMISS)00068415-68424 [Plaintiff Deposition Exhibit P-54]	Report regarding Lazare dated December 1, 2009	

Exhibit No.	Bates Range	Description	Defendant's Objection
46.	KBC-Venue-Discovery003012003014-3015 [Plaintiff Deposition Exhibit P-56]	Letter dated September 4, 2000 from Loral to Boston re: SLA	
47.	KBC-Venue-Discovery002380 & 2387 [Plaintiff Deposition Exhibit P-58]	Statement for ADB Pooling Account at KBC-NY referencing KT and DD dated 09/04/2007-09/28/2007	Relevance.
48.	LKI0001647, LKI000854, ADB(MOTION TO DISMISS)00063338, KBC-Venue-Discovery002360 [Plaintiff Deposition Exhibit P-61]	(i) KBC transfer form dated August 10, 2007; (ii) KBC-NY Bank Account Statement for August 2007; (iii) ADB loan folios ("blue slips") dated August 13, 2007 and August 14, 2007; (iv) ADB Pooling Account Statement for August 2007	
49.	LKI0001646; LKI000855; ADB(MOTION TO DISMISS)0063339, KBC-Venue-Discovery002364 [Plaintiff Deposition Exhibit P-62]	(i) KBC Transfer form dated August 17, 2007; (ii) KBC Bank Account Statement for August 2007, (iii) ADB loan folios ("blue slips") dated August 16, 2007 and August 17, 2007; (iv) ADB Pooling Account Statement for August 2007	
50.	ADB(MOTION TO DISMISS)00000623 & 711 [Plaintiff Deposition Exhibit P-68]	ADB account application form and signature card -- ADB's version with dates filled in and word "Antwerp" added	

Exhibit No.	Bates Range	Description	Defendant's Objection
51.	ADB(MOTION TO DISMISS)00062761-62785 [Plaintiff Deposition Exhibit P-69]	Bank procedure C08: Know Your Customer: Customer Acceptance Account Opening Process Risk Classification, dated October 1, 2009	
52.	LKI0002236-2241 [Plaintiff Deposition Exhibit P-74]	ADB "Agreement E-Banking Registration Form" for Lazare Kaplan Belgium N.V.	
53.	LKI0002219-2220 [Plaintiff Deposition Exhibit P-75]	Notice re: Secured e-mail for ADB Clients, sent to Lazare Kaplan Belgium N.V., dated December 3, 2002	
54.	LKI0002217 [Plaintiff Deposition Exhibit P-76]	ADB Agreement re: Telefax dated July 18, 2007, sent to Lazare Kaplan Belgium N.V.	
55.	ADB(MOTION TO DISMISS)00032012-32013 [Plaintiff Deposition Exhibit P-80]	Telefax message dated April 25, 2001 from Driesen & Weiss to [redacted], re: Lazare payment instruction	
56.	ADB(MOTION TO DISMISS)00032016-32018 [Plaintiff Deposition Exhibit P-81]	Telefax message dated June 5, 2001 from Driesen & Weiss to [redacted], re: Lazare payment instruction	

Exhibit No.	Bates Range	Description	Defendant's Objection
57.	ADB(MOTION TO DISMISS)00032021-32022 [Plaintiff Deposition Exhibit P-82]	Telefax message dated June 11, 2001 from Driesen & Weiss to [redacted], cc to Loral, re: Lazare payment instruction	
58.	ADB(MOTION TO DISMISS)00032025-32026 [Plaintiff Deposition Exhibit P-83]	Telefax message dated June 28, 2001 from Driesen & Weiss to [redacted], re: Lazare payment instruction	
59.	ADB(MOTION TO DISMISS)00000017, 20-22 [Plaintiff Deposition Exhibit P-84]	(i) Email dated July 23, 2008 from Champine to Loral, cc Weiss re: LKI sight payments; (ii) Email dated August 6, 2008 from Champine to [redacted], cc Weiss, Loral and [redacted] re: DTC sight payment	
60.	None [Plaintiff Deposition Exhibit P-109]	(i) Press release from Citicorp Information Technology Industries Limited re: FLEXCUBE implementation with ADB, dated January 24, 2000; (ii) Business Line article re: FLEXCUBE implementation at ADB, dated January 7, 2003	
61.	ADB(MOTION TO DISMISS)00009461 [Plaintiff Deposition Exhibit P-110]	Email dated December 6, 2006 from [redacted] to Diana David, cc Loral, re: FLEXCUBE printouts	

Exhibit No.	Bates Range	Description	Defendant's Objection
62.	KBC-Venue-Discovery002313-2314, 2326-2327, 2330, 2345, 2350, 2378, 2380, 2383, 2385, 2387, 2393, 2396, 2400, 2419, 2435, 2461, 2489, 2522, 2161, 2164, 2170-2185, 2192, 2500, 2199, 2202, 2204, 2208, 2224-2225, 2228, 2230, 2233, 2236-2237, 2505, 2240, 2244-2245, 2252, 2255-2258, 2260, 2263-2264, 2266-2275, 2279-2282, 2506-2511, 2514, 2516-2518, 2283-2287, 2289-2290, 2293, 2295-2299, 2301, 2303 [Plaintiff Deposition Exhibit P-112]	KBC-NY Bank Account statements for ADB Pooling Account, dated May 4, 2007 to July 31, 2007, September 4, 2007 to December 31, 2007, February 1, 2008 to February 31, 2008, June 1, 2008 to February 27, May 1, 2009 to 2009 to December 31, 2010.	
63.	ADB(MOTION TO DISMISS)00068893-68899 [Plaintiff Deposition Exhibit P-121]	(i) Email dated September 10, 2009 from Dullaert to Snyers re: recent advice and decisions of LCC and ECC; (ii) attached report re: recent advice and decisions of LCC and ECC	Relevance.
64.	ADB(MOTION TO DISMISS)00035211-35248 [Plaintiff Deposition Exhibit P-130]	(i) Email dated September 2, 2009 to Diana David re: Borrowing base Certificates; (ii) Borrowing Base Certificate dated September 2, 2009; (iii) Lazare accounts receivable	
65.	ADB(MOTION TO DISMISS)00002225-2235 [Plaintiff Deposition Exhibit P-131]	(i) Email dated May 6, 2009 from Champine to Loral re: LKI Consolidated BBC; (ii) Borrowing Base Certificate dated April 30, 2009 containing Lazare accounts receivable	Relevance.

Exhibit No.	Bates Range	Description	Defendant's Objection
66.	KBC-Venue-Discovery004467-4502 [Plaintiff Deposition Exhibit P-138]	Guidelines for Credit Granting, dated July 2001	Relevance.
67.	KBC-Venue-Discovery000058-97	Lazare's Bank Account Statements for KBC-NY Bank Account 24079801, dated August 1, 2007 to August 31, 2007, December 3, 2007 to December 31, 2007, January 31, 2007 to February 28, 2007, December 31, 2006 to January 31, 2007, July 2, 2007 to July 31, 2007, and June 1, 2007 to June 28, 2007.	
68.	KBC-Venue-Discovery000124-237	Lazare's Bank Account Statements for KBC-NY Bank Account 24079801, dated between September 4, 2007 to September 28, 2012	
69.	KBC-Venue-Discovery000378	Email dated April 29, 2008 from Maeckelbergh to Idealcut re: confirmation	
70.	KBC-Venue-Discovery000565-570	Email string dated January 16, 2009 from Groel to Maeckelbergh, Poduska, Candiana and Van Offenwort re: difference in interest	
71.	KBC-Venue-Discovery004312	ECC and LCC decision dated December 15, 2009, December	Relevance.

Exhibit No.	Bates Range	Description	Defendant's Objection
		17, 2009 and December 22, 2009	
72.	KBC-Venue-Discovery004339	ECC decision dated December 22, 2009	Relevance.
73.	KBC-Venue-Discovery004409-4434	KBC IKB Counterparty Delegations dated January 10, 2008 Part 1- General	Relevance.
74.	KBC-Venue-Discovery004435-4466	KBC IKB Counterparty Delegations dated January 10, 2008 Part 2 - Delegations for Risk on Corporates, Authorities and International Institutions	Relevance.
75.	KBC-Venue-Discovery004485-4502	Guidelines for Credit Granting to the Diamond and Jewelry Market in New York, dated July 2001 with June 12, 2008 update	Relevance.
76.	KBC-Venue-Discovery004503-4532 KBC-Venue-Discovery004503-4532 [English Translation]	Krachtlijnen Van Het Kredietbeheer, ADB NV Herziening April 2002 Key Principles of Credit Management, ADB NV, Revision April 2002 (sworn English translation)	Relevance.
77.	KBC-Venue-Discovery004533-4564	KBC IKB Counterparty Delegations dated June 16,	Relevance.

Exhibit No.	Bates Range	Description	Defendant's Objection
		2008 Part 2 - Delegations for Risk on Corporates, Authorities and International Institutions	
78.	KBC-Venue-Discovery004565-4598	KBC IKB Counterparty Delegations dated February 20 2008 Part 2 - Delegations for Risk on Corporates, Authorities and International Institutions	Relevance.
79.	KBC-Venue-Discovery004599-4624	KBC IKB Counterparty Delegations dated September 23, 2009 Part 1 - General	Relevance.
80.	KBC-Venue-Discovery004625-4660	KBC IKB Counterparty Delegations dated September 23 2009 Part 2 - Delegations for Risk on Corporates, Authorities and International Institutions	Relevance.
81.	LKI0000858-974	Lazare's Bank Statements for KBC-NY Bank Account 24079801 dated January 2, 2008 to October 31, 2012	
82.	LKI0002218	ADB Agreement concerning the Use of Telefax in Relations, dated July 18, 2007	
83.	ADB(MOTION TO DISMISS)00000044-49	ADB General Banking Conditions	

Exhibit No.	Bates Range	Description	Defendant's Objection
84.	ADB(MOTION TO DISMISS)00000440-455	(i) Email dated January 6, 2006 from Weiss to Moryto, cc Loral, Champigne, and Snyers re: request to sign and initial attached credit confirmation letter; (ii) credit confirmation letter	
85.	ADB(MOTION TO DISMISS)00001056-1064	(i) Email dated January 5, 2006 from [Redacted] to Weiss, cc Snyers, re: Credit confirmation letter LKB; (ii) Annex 1 to credit confirmation letter dated December 30, 2005 (English translation); (iii) Annex 1 credit confirmation letter dated December 30, 2005 (untranslated); (iv) credit confirmation letter dated December 30, 2005 (untranslated); (v) credit confirmation letter dated December 30, 2005 (English translation)	
86.	ADB(MOTION TO DISMISS)00001082-1083	Email dated January 5, 2006 from Loral to [redacted], Weiss, Champine and Snyers re: Credit confirmation letter LKB	
87.	ADB(MOTION TO DISMISS)00001315	ADB Loan Folio ("blue slip") dated August 19, 2008	

Exhibit No.	Bates Range	Description	Defendant's Objection
88.	ADB(MOTION TO DISMISS)00005576-5586	Lazare credit application review, dated April 14, 2001	
89.	ADB(MOTION TO DISMISS)00015470-15471	Email dated January 6, 2006 from Weiss to Champine re: credit confirmation letter LKB	
90.	ADB(MOTION TO DISMISS)00015522-15537	(i) Email dated January 5, 2006 from Weiss to Moryto, cc Loral and Champigne, re: General Conditions LKI Belgium NV and New York; (ii) Antwerp ADB general credit granting conditions and general conditions for banking operations; (iii) Addendum to credit confirmation letter, dated December 30, 2005	
91.	ADB(MOTION TO DISMISS)00058459--58474	Credit application review dated August 14, 2001, with Annexes	Relevance.
92.	ADB(MOTION TO DISMISS)00066267-66276	Memo dated October 4, 2010 from Dullaert to De Bosscher, cc Weiss re: ADB NY credit guidelines update	
93.	None	ADB Termination Letter, dated January 15, 2015	Relevance; Authenticity.
94.	None	Lazare Schedule analyzing dollar amounts of Lazare's KBC-NY wire transfers.	Authenticity.